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11 JOSE FERNANDO GOMEZ-MOREIRA

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 vs.
19 JOSE FERNANDO GOMEZ-
20 MOREIRA,
21 Defendant.

22 Case No. 1:20-cr-00151-NONE-SKO

23 **STIPULATION TO CONTINUE
24 SENTENCING HEARING and ORDER**

25 Date: October 1, 2021
26 Time: 9:30 a.m.
Judge: Hon. Dale A. Drozd

27
28 The parties, through their respective counsel, Laura Withers, Assistant United States
Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender,
counsel for the defendant, Jose Fernando Gomez-Moreira, hereby stipulate that the sentencing
hearing set for Friday, October 1, 2021 at 9:30 a.m., before the Honorable Dale A. Drozd, be
continued to Friday, October 15, 2021 at 9:30 a.m.

29
30 The parties wish to continue sentencing in this matter at the request of defense counsel, as
31 defense counsel requires additional time to gather and review records. Defense counsel recently
32 received Mr. Gomez-Moreira's children's school records as two of his children require special
33 education services. The records of their assessments are in the Spanish language and require
34 translation. In addition, defense counsel is still awaiting delivery of records related to Mr. Gomez-
35 Moreira's prior incarceration in the state of Rhode Island, which have not yet arrived. Defense had

1 fully expected the records in question by the filing deadline, apologizes for the inconvenience
2 caused by the delay. The government does not object.

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6 //

7 Respectfully submitted,

8 PHILLIP A. TALBERT
9 Acting United States Attorney

10 Dated: September 29, 2021

11 /s/ Laura Withers
12 LAURA WITHERS
13 Assistant U.S. Attorney

14 Dated: September 29, 2021

15 HEATHER E. WILLIAMS
16 Federal Defender

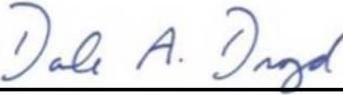
17 /s/ Benjamin A. Gerson
18 BENJAMIN A. GERSON
19 Assistant Federal Defender
20 Attorney for Defendant
21 JOSE FERNANDO GOMEZ-MOREIRA

22 **O R D E R**

23 **GOOD CAUSE APPEARING**, the above stipulation to continue the sentencing hearing
24 in case 1:20-cr-00151 to October 15, 2021 is hereby accepted and adopted as the order of this
25 Court.

26 IT IS SO ORDERED.

27 Dated: September 30, 2021

28 
UNITED STATES DISTRICT JUDGE